

April 17, 2024

Hon. Magistrate Parker
United State District Court, S.D.N.Y.
500 Pearl Street, Courtroom 17D
New York, NY 10007

RE: motion to compel appropriate 30(b)(6) answers and general motion to compel (combined with procedural request for letter-motion longer than three pages)

VIA: electronic submission through *Pro-Se* Intake Unit

Your Honor,

I am the *pro-se* Plaintiff in the above-mentioned matter, hereinafter referred to in first person or as “Plaintiff.”

Earlier this week, on April 15, 2024, Plaintiff filed a MOTION TO COMPEL APPROPRIATE 30(B)(6) ANSWERS and GENERAL MOTION TO COMPEL. There is a typo/error in said Motion, which Plaintiff wishes to correct herein.

On p.2 of the Motion, it reads:

Plaintiff attempted to resolve this, subsequent to the deposition, with Mr. Blumetti, Defendant- Campaign’s counsel. During the call, Mr. Blumetti took the position that the complaints made during the 2020 election cycle (2017-2020) are not relevant, which was an entirely new position to take **and one taken by the witness.**

(bold emphasis added)

The Motion meant to read: “and **not** one taken by the witness.”

Please pardon the error.

Respectfully and humbly submitted,
s/ Arlene Delgado
Plaintiff, *pro-se*

